

December 30, 2024

VIA ECF

Hon. Pamela K. Chen
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *PleasrDAO v. Shkreli*; Case No. 1:24-cv-04126
Letter Request to Extend Reply and Filing Deadlines for Motion to Dismiss
Briefing

Dear Judge Chen:

Our firm is counsel for Defendant Martin Shkreli (“Defendant”) in the above referenced matter. We write with the consent of Plaintiff PleasrDAO (“Plaintiff” and, together with Defendant, the “Parties”) pursuant to Your Honor’s Individual Rules of Practice to respectfully request an extension of the deadline for Defendant’s Reply Brief on its Motion to Dismiss. The current schedule, with the proposed extension dates, is as follows:

| Event | Current Deadline | Proposed Deadline |
|--|-------------------|-------------------|
| Defendant’s Deadline to Serve Reply to Plaintiff’s Opposition to Motion to Dismiss | December 30, 2024 | January 6, 2025 |
| Filing of the Parties’ Briefing on Motion to Dismiss | December 30, 2024 | January 6, 2025 |

This is the fourth time the Parties have requested an extension of time for these deadlines and this extension will not impact any other deadlines set by the Court.

We thank the Court for its time and attention in this matter.

Respectfully submitted,

/s/ Meredith Lloyd

Edward Andrew Paltzik, Esq.

Erik J. Dykema, Esq.

Serge Krimnus, Esq.

Meredith Lloyd, Esq. (*pro hac vice*)*Attorneys for Defendant*